

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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N00296.002090

MOFFETT FIELD

SSIC NO. 5090.3

August 4, 1994
2189.8009 (RCG)

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, CA 94066-2402

SUBJECT: NAVAL AIR STATION, MOFFETT FIELD, CALIFORNIA, ACTIVE
PETROLEUM SITES INVESTIGATION DRAFT FIELD WORKPLAN

Dear Mr. Chou:

The comments below are the result of review by CAL-EPA, Regional Water Quality Control Board, San Francisco Bay Region regarding the document referenced above. Review of this document was delayed as a result of an incorrect figure being included in the report. It was not possible to provide an adequate review without the correct figure which was not received until July 29, 1994.

Page 9, Section 4.2.1

It is impossible to determine if potential impacts to groundwater from the inaccessible pits in hangar one will be adequately monitored by the existing groundwater monitoring well network from this document. This document should include the location of existing groundwater monitoring wells near hangar 1 and appropriate groundwater gradient information. Further, until this information is included it is impossible to assess the adequacy of the number of soil borings.

Page 11, Section 4.3

It is not acceptable to collect the initial sample at 5 feet below grade. The initial sample should be collected at some specified depth below any sub-base material or beneath the asphalt. This depth should be selected to limit the potential impacts of the asphalt on the analytical results, but limited to detect any recent spills that may not have had time to migrate to depth.

Page 12, Section 4.3

Samples to be collected at the fuel pier should include a surface sediment sample and a sample at 1 foot depth. These samples should follow protocol for sediment samples, not soil samples.

Improved diagrams of the fuel drain outlets need to be included to allow a reasonable indication of location of outlets. This is necessary to allow correlation with other

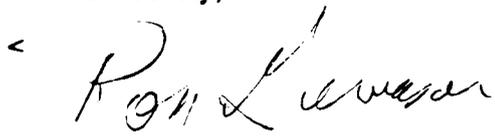
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sample locations and to determine if the number of samples proposed is adequate.

Page 14, Table 3

At a minimum a subset of samples should be analyzed for semi-volatile compounds or additional rationale for not including this analysis shall be included in the text before this analytical suite can be approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Gervason". The signature is written in a cursive style with a large initial "R".

Ron Gervason, Senior
Engineering Geologist

cc: Mr. Micheal Gill - USEPA
Mr. Joseph Chou - CALEPA-DTSC Region 2